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14 Attorneys for Defendants KIM SOFFE, COLLIN PETRIELIUS and NAPHCARE, INC.

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 CRAIG FARAH, Personal Representative of the
18 ESTATE OF NICHOLAS FARAH,

19 Plaintiffs,
20 vs.

21 LAS VEGAS METROPOLITAN POLICE
22 DEPARTMENT; RICHARD NEWMAN;
23 SAMUEL MENDOZA; AARON MOSELY;
24 JEREMEY STEWART; CHRISTY SNAPP;
25 GABRIEL VILLANUEVA; KIM SOFFE; COLLIN
26 PETRIELIUS and NAPHCARE, INC.

27 Defendants.

28 CASE NO.: 2:20-cv-00604-RFB-VCF

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STIPULATION AND [PROPOSED] ORDER TO
EXTEND DISCOVERY AND EXPERT
DISCLOSURE DATES

STIPULATION TO EXTEND SCHEDULED DEADLINES

(FIRST REQUEST)

Pursuant to LR7-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request this Court extend the Discovery Deadlines in the above captioned case for one hundred twenty (120) days and the Expert Disclosure date be extended to March 29, 2021. In support of this Stipulation and Request, the parties state as follows:

A. DISCOVERY COMPLETED TO DATE:

1. Plaintiffs' Initial Disclosures;
2. Plaintiffs' Interrogatories, Request for Production and Request for Admissions to Defendants;
3. Defendants' Initial Disclosures;

B. DISCOVERY REMAINING TO BE COMPLETED

1. Deposition of Plaintiff;
2. Depositions of individually named Defendants;
3. Depositions of Plaintiff's and Decedent's treating medical providers;
4. Initial expert and rebuttal expert disclosures;
5. Depositions of additional witnesses (as needed).

C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES

The parties have been diligent in completing discovery. This is a complex case involving the death of a detainee at Clark County Detention Center. There are 10 named defendants and 10 causes of action alleged. Defendant NaphCare, Inc. was only recently served and appeared for the first time on October 29, 2020 when it timely filed its responsive pleading. The parties need additional time to complete additional discovery, including the depositions of Plaintiff, the multiple individually named Defendants and other witnesses prior to the disclosure of experts. This stipulation to extend deadlines is made in good faith without any intent to delay this matter.

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1 **D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

2 1. Close of Discovery shall be extended from Friday, February 26, 2021 to Monday, June
3 28, 2021.

4 2. The deadline to file Motions to Amend the Pleadings or to Add Parties shall be extended
5 from Monday, November 30, 2020 to Tuesday, March 30, 2021.

6 3. The deadline for Initial Expert Disclosures, in accordance with Fed.R.Civ.P 26(a)(2)
7 and LR 26-1(e)(3), shall be extended from Monday, December 28, 2020 to Tuesday,
8 April 27, 2021.

9 4. The deadline for Rebuttal Expert Disclosures shall be extended from Wednesday,
10 January 27, 2020 to Thursday, May 21, 2021.

11 5. The deadline for filing Dispositive Motions shall be extended from Monday, March 29,
12 2021 to Tuesday, July 27, 2021.

13 6. The deadline for the Joint Pre-Trial Order shall be extended from Wednesday, April 28,
14 2020 to Thursday, August 26, 2021. This deadline will be suspended if dispositive
15 motions are timely filed, until 30 days after the decision of the dispositive motions or
16 until further order of the Court.

17 **E. GOOD CAUSE FOR MAKING REQUEST WITHIN 21 DAYS OF DEADLINE**

18 The parties understand that this Request for the Extension of Scheduled Deadlines is being made
19 within 21 days of the deadline to file Motions to Amend the Pleadings or to Add Parties currently set
20 for November 30, 2020. Good cause exists for making this request at this time as Defendant NaphCare,
21 Inc. appeared in this case for the first time on October 29, 2020. Defendant NaphCare, Inc. did not
22 participate in the Rule 26(f) conference and did not agree to the current discovery deadlines. Once
23 counsel for Defendant NaphCare, Inc. learned of the current discovery deadlines it immediately
24 prepared the instant Stipulation and Order and sent it to other counsel for approval.

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1 DATED this 23rd day of November 2020

2 **LOEJVY & LOEJVY**

3 /s/ Sarah Grady, Esq.
4 SARAH GRADY, ESQ.
5 311 N. Aberdeen Street, 3rd Floor
6 Chicago, IL 60607
7 Attorneys for Plaintiff, Craig Farah, personal
8 representative of The Estate of Nicolas Farah

9 Dated this 23rd day of November, 2020

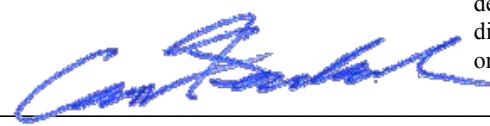
10 **MARQUIS AURBACH COFFING**

11 /s/ Craig R. Anderson, Esq.
12 CRAIG R. ANDERSON, ESQ. – Bar No. 6882
13 100001 Park Run Drive
14 Las Vegas, NV 89145
15 Attorneys for Las Vegas Metro Police
Department; Richard Newman; Samuel
Mendoza; Aaron Mensely; Jeremy Stewart;
Christy Snapp; Gabriel Villanueva

16 **IT IS SO ORDERED** that the instant Stipulation to Extend Discovery and Expert Disclosures
17 Dates is **GRANTED** and the discovery deadlines shall be amended as follows:

Close of Discovery:	June 26, 2021
Last Day to Amend Pleadings and Add Parties:	March 30, 2021
Initial Expert Designation:	April 27, 2021
Rebuttal Expert Designation:	May 21, 2021
Last Day for Dispositive Motions:	July 27, 2021
Joint Pre-Trial Order	August 26, 2021

If dispositive motions
are filed, the deadline
for filing the joint
pretrial order will be
suspended until 30
days after
decision on the
dispositive motions
or further court order.

26 
UNITED STATES MAGISTRATE JUDGE

27 DATED: 11-23-2020
28

Cheyenne Allmaras

From: Paul A. Cardinale
Sent: Monday, November 23, 2020 1:53 PM
To: Cheyenne Allmaras
Subject: FW: Farah--Stip and Order to Extend Deadlines



Paul A. Cardinale
LAURIA TOKUNAGA GATES & LINN, LLP
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From: Sarah Grady <sarah@loevy.com>
Sent: Monday, November 23, 2020 1:37 PM
To: Paul A. Cardinale <pcardinale@ltglaw.net>
Cc: Craig Anderson <canderson@maclaw.com>; Liesa M. Costa <lcosta@ltglaw.net>; David B. Owens <david@loevy.com>; Sherri Mong <SMong@maclaw.com>; Leah Dell <LDell@maclaw.com>
Subject: Re: Farah--Stip and Order to Extend Deadlines

This is fine with me. Thanks.

Sarah C. Grady
LOEVY & LOEVY
311 North Aberdeen, 3rd Floor
Chicago, Illinois 60607
Phone: 312.243.5900
Email: sarah@loevy.com
Pronouns: she/her

On Mon, Nov 23, 2020 at 1:31 PM Paul A. Cardinale <pcardinale@ltglaw.net> wrote:

Thanks Craig. Sarah are you able to let me know today if I can affix your signature on this stipulation to continue?

Thank you,



Paul A. Cardinale

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From: Craig Anderson <canderson@maclaw.com>

Sent: Friday, November 20, 2020 4:32 PM

To: Paul A. Cardinale <pcardinale@ltglaw.net>; Sarah Grady <sarah@loevy.com>

Cc: Liesa M. Costa <lcosta@ltglaw.net>; David B. Owens <david@loevy.com>; Sherri Mong <SMong@maclaw.com>;

Leah Dell <LDell@maclaw.com>

Subject: RE: Farah--Stip and Order to Extend Deadlines

I'm good with this. You can use my signature.



Craig R. Anderson, Esq.

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From: Paul A. Cardinale <pcardinale@ltglaw.net>

Sent: Friday, November 20, 2020 1:15 PM

To: Sarah Grady <sarah@loevy.com>; Craig Anderson <canderson@maclaw.com>

Cc: Liesa M. Costa <lcosta@ltglaw.net>; David B. Owens <david@loevy.com>; Sherri Mong <SMong@maclaw.com>;

Leah Dell <LDell@maclaw.com>

Subject: [External] Farah--Stip and Order to Extend Deadlines

Importance: High

Sarah and Craig:

I have attached the Proposed Stip and Order to extend deadlines in this case. Please let me know if you approve it as soon as you are able. I am hoping to submit it to the Court on Monday since the current deadline to Amend Pleadings and Add Parties is November 30. If we submit the S&O after that date, I/we have to show excusable neglect as to why the S&O was not submitted before the deadline.

Thank you,



Paul A. Cardinale

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